

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Yarnell Jaquan Jackson

Case: 4:22-mj-30244  
Judge: Curtis Ivy, Jr.  
Filed: 05-23-2022  
CMP USA V JACKSON (kcm)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 20, 2022 in the county of Genesee in the  
Eastern District of Michigan, the defendant(s) violated:

| <i>Code Section</i>      | <i>Offense Description</i>       |
|--------------------------|----------------------------------|
| 18 U.S.C. § 922(g)(1)(a) | Felon in possession of a firearm |

This criminal complaint is based on these facts:

Please see attached affidavit

Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: May 23, 2022

City and state: Flint, Michigan

  
Complainant's signature

Dustin Hurt, Special Agent - ATF&E  
Printed name and title

  
Judge's signature

Curtis Ivy, Jr., United States Magistrate Judge  
Printed name and title

**AFFIDAVIT**

I, Dustin Hurt, being first duly sworn, state as follows:

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since October of 2018. I am currently assigned to the Detroit Field Division, Flint Field Office. Before working for the ATF, I was employed by the Michigan Department of State Police (MSP) for approximately seven years. Before working for MSP, I was a local police officer for the Grand Ledge Police Department for approximately three years. I held numerous positions with the MSP, including Detective Sergeant in the Polygraph Unit and Task Force Officer with the FBI. During my employment with ATF and MSP, I have conducted or participated in numerous criminal investigations focused on firearms, armed drug trafficking, and criminal street gangs, and other violations of federal law.

2. I make this affidavit from personal knowledge based on my participation in this investigation, my review of reports and other materials prepared by those who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

***Probable Cause***

3. On May 20, 2022, local law enforcement officers executed a state search warrant at a house on Dupont Street in Flint, within the Eastern District of Michigan. The search warrant was executed for an unrelated state investigation at the house where Yarnell Jaquan Jackson (xx/xx/96) was known to reside.

4. During the search, officers encountered Yarnell Jackson and another person in the basement. Jackson was in a bedroom that also had his driver's license, and papers and mail with his name on them. On the bedroom wall, wooden block letters spelled out the name, "YARNELL." Officers found an American Tactical, Model: Omni Hybrid, multi-caliber rifle under a dresser in that same bedroom. The rifle was loaded with one round inside the chamber, but no magazine was inserted into the magazine well of the firearm. Officers seized two PMAG 5.56 x 45 magazines, loaded with 21 and 27 live rounds of 5.56 ammunition respectively, next to the rifle under the dresser.

5. I have reviewed records for Jackson's criminal history. On May 17, 2019, Jackson pled guilty to (1) Carrying a Concealed Weapon, (2) Assaulting, Resisting and Obstructing a Police Officer, and (3) Felony Firearm in the 7th Circuit Court of Michigan, in case number 18-043644-FH. I know that a felony firearm

conviction carries a mandatory term of two years' imprisonment in the State of Michigan. On July 29, 2019, Jackson was sentenced to prison.

6. I am recognized by ATF as having expertise in the interstate travel and manufacture of firearms. The American Tactical, Model: Omni Hybrid, multi-caliber rifle described above was manufactured outside of the State of Michigan and therefore traveled through interstate commerce before Jackson possessed it. It is a firearm as defined in Chapter 44, Title 18, United States Code.

7. Based on Jackson's prior felony convictions and sentence in excess of one year, there is probable cause to believe that Jackson knew he was a felon convicted of an offense punishable by more than one year' imprisonment in May 2022.

*Conclusion*

8. Based on the foregoing, I have probable cause to believe that on May 20, 2022, in the Eastern District of Michigan, Yarnell Jackson, knowing that he had been convicted of a felony offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm in violation of 18 U.S.C. § 922(g)(1).

  
DUSTIN HURT, Special Agent  
Bureau of Alcohol, Tobacco, Firearms & Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means on May 23, 2022.

  
HON. CURTIS IVY, JR.  
United States Magistrate Judge